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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ESTATE OF AARON D. STANTON, by DOUGLAS STANTON, Personal Representative, and A. S., a minor, by and through her Guardian ad Litem, DOUGLAS STANTON, Plaintiffs, v. JOSHUA DYK and CITY OF PORTLAND, a municipal corporation, Defendants.	Case No. 3:23-cv-01767-AN DECLARATION OF J. ASHLEE ALBIES IN SUPPORT OF PLAINTIFFS' MOTION FOR A PROTECTIVE ORDER LIMITING THE DEPOSITION OF MINOR PLAINTIFF A.S.
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I, J. Ashlee Albies, do hereby declare:

1. I am one of the attorneys for Plaintiffs in this matter. I make this declaration in support of Plaintiffs' Motion for a protective order limiting the deposition of minor Plaintiff A.S.
2. The parties have engaged in extensive discovery, including depositions of major witnesses, Stanton's parents and brother, and Stanton's girlfriend/A.S.'s mother.
3. A.S. was six at the time of the incident, and is now nine years old. The City seeks to take

the deposition of A.S. by City Attorney Caroline Turco, which Plaintiffs oppose. During conferral on this motion, Attorney Turco represented to me that she has no formal or informal training on conducting informed trauma interviews, and no formal or informal training on conducting legal interviews of minors who have suffered extensive trauma.

4. Attached hereto as Exhibit 1 is a true and correct copy of excerpts the deposition of A.S.'s mother, Vansopheak Phou, taken on November 8, 2024.
5. Attached hereto as Exhibit 2 is a true and correct copy of excerpts the deposition of A.S.'s grandmother and Aaron Stanton's mother, Karen Stanton, taken on November 12, 2024.
6. Attached hereto as Exhibit 3 is a true and correct copy of excerpts the deposition of A.S.'s uncle, Aaron Stanton's brother, Taylor Stanton, taken on November 12, 2024.
7. Attached hereto as Exhibit 4 is a letter from Dr. Jennifer Harris, a licensed clinical psychologist who regularly conducts forensic evaluations.
8. I have conferred with opposing counsel Carey Caldwell and Caroline Turco, and defendants object to this motion.

DATED: March 06, 2025.

s/ J. Ashlee Albies
J. Ashlee Albies, OSB No. 051846
Of Attorneys for Plaintiffs